

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JUAN ROLANDO RUBIO LOPEZ	:	VIOLATION:
WILFREDO ADAMES		
HECTOR GARCIA	:	21 U.S.C. § 846
JORGE SANTANA		(conspiracy to distribute and possess with intent to
	:	distribute over 5 kilograms of cocaine - 1 count)
		21 U.S.C. § 841(a)(1), (b)(1)(A)
	:	(possession with intent to distribute over 5
		kilograms of cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1), (b)(1)(B)
		(possession with intent to distribute over 500
	:	grams of cocaine - 1 count)
		21 U.S.C. § 853 (notice of criminal forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least on or about September 6, 2005 through on or about September 7, 2005, in King of Prussia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JUAN ROLANDO RUBIO LOPEZ
WILFREDO ADAMES,
HECTOR GARCIA, and
JORGE SANTANA**

conspired and agreed to knowingly and intentionally distribute, and to possess with intent to distribute, 5 kilograms or more, that is, approximately 30 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. The defendants transported approximately 30 kilograms of cocaine across country by hiding it in the cab of a tractor-trailer, for eventual distribution in the Philadelphia area.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about the first week in September 2005, in Arizona, defendant JUAN ROLANDO RUBIO LOPEZ hired defendants HECTOR GARCIA and JORGE SANTANA to drive a tractor-trailer containing approximately 30 kilograms of cocaine to King of Prussia, Pennsylvania.

2. On or about September 6, 2005, defendants HECTOR GARCIA and JORGE SANTANA drove the tractor-trailer containing the approximately 30 kilograms of cocaine through Ohio, in route to King of Prussia, Pennsylvania.

3. On or about September 7, 2005, defendants JUAN ROLANDO RUBIO LOPEZ and WILFREDO ADAMES arrived at the Motel 6, Room 162, 818 West DeKalb Pike, King of Prussia, Pennsylvania, with \$552,446 in the trunk of their car, to pick up the approximately 30 kilograms of cocaine from defendants HECTOR GARCIA and JORGE SANTANA.

4. On or about September 7, 2005, defendants JUAN ROLANDO RUBIO LOPEZ and WILFREDO ADAMES carried a duffle bag containing approximately 30 kilograms of cocaine from Room 162 of the Motel 6, 818 West DeKalb Pike, King of Prussia, Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 7, 2005, in King of Prussia, in the Eastern District of Pennsylvania,
defendants

**JUAN ROLANDO RUBIO LOPEZ and
WILFREDO ADAMES**

knowingly and intentionally possessed with intent to distribute over 5 kilograms, that is approximately 30 kilograms, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 7, 2005, in King of Prussia, in the Eastern District of Pennsylvania,
defendants

**JUAN ROLANDO RUBIO LOPEZ and
WILFREDO ADAMES**

knowingly and intentionally possessed with intent to distribute over 500 grams, that is, approximately 1,000 grams, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**JUAN ROLANDO RUBIO LOPEZ and
WILFREDO ADAMES**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense(s), including, but not limited to:

(1) a 2000 Kenworth Tractor, vehicle identification number 1XKTDR9X2YJ836098;

(2) \$552,446 United States currency

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney